

**U.S. FISH AND WILDLIFE SERVICE  
SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM**

SCIENTIFIC NAME: *Eriogonum kelloggii*

COMMON NAME: Red Mountain buckwheat

LEAD REGION: Region 8

INFORMATION CURRENT AS OF: April 1, 2010

**STATUS/ACTION:**

☐ Species assessment - determined we do not have sufficient information on file to support a proposal to list the species and, therefore, it was not elevated to Candidate status

☐ New candidate

☒ Continuing candidate

☐ Non-petitioned

☒ Petitioned - Date petition received: May 11, 2004  
(Center for Biological Diversity *et al.* 2004)

☐ 90-day positive - FR date:

☐ 12-month warranted but precluded - FR date:

☐ Did the petition request a reclassification of a listed species?

**FOR PETITIONED CANDIDATE SPECIES**

a. Is listing warranted? Yes

b. To date, has publication of a proposal to list been precluded by other higher priority listing actions? Yes

c. If the answer to a. and b. is "yes", provide an explanation of why the action is precluded: Higher priority listing actions, including court-approved settlements, court-ordered and statutory deadlines for petition findings and listing determinations, emergency listing determinations, and responses to litigation, continue to preclude the proposed and final listing rules for the species. We continue to monitor populations and will change its status or implement an emergency listing if necessary. The "Progress on Revising the Lists" section of the current CNOR (<http://endangered.fws.gov/>) provides information on listing actions taken during the last 12 months.

☐ Listing priority change

Former LP: ☐

New LP: ☐

Date when the species first became a Candidate (as currently defined): 1975

☐ Candidate removal: Former LP: ☐

- \_\_\_ A - Taxon is more abundant or widespread than previously believed or not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status.
- \_\_\_ U - Taxon not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status due, in part or totally, to conservation efforts that remove or reduce the threats to the species.
- \_\_\_ F - Range is no longer a U.S. territory.
- \_\_\_ I - Insufficient information exists on biological vulnerability and threats to support listing.
- \_\_\_ M - Taxon mistakenly included in past notice of review.
- \_\_\_ N - Taxon may not meet the Act's definition of "species."
- \_\_\_ X - Taxon believed to be extinct.

#### ANIMAL/PLANT GROUP AND FAMILY

Flowering plants, Polygonaceae (Buckwheat Family)

#### HISTORICAL STATES/TERRITORIES/COUNTRIES OF OCCURRENCE:

Mendocino County, California

#### CURRENT STATES/ COUNTIES/TERRITORIES/COUNTRIES OF OCCURRENCE:

Mendocino County, California

#### LAND OWNERSHIP

Forty one of the 44 occupied polygons mapped on Red Mountain by Jennings (2003, p. 2) are located on Bureau of Land Management (BLM) lands. In October, 2006, the BLM portion of the distribution was designated the Red Mountain Unit of the South Fork Eel River Wilderness Area (hereafter referred to as the Red Mountain Wilderness), managed by BLM. The remaining polygons are located on lands owned by Coombs Tree Farm of Garberville, California. The single occurrence documented on Little Red Mountain (50 plants in 2003) is owned by the California Department of Fish and Game (CDFG) (Imper 2003). Proportional ownership is estimated as follows: Federal (BLM), 83 percent; private, 17 percent and State of California, less than one percent.

LEAD REGION CONTACT: Region 8, Andy DeVolder (916) 414-6464;

Andy\_DeVolder@fws.gov)

LEAD FIELD OFFICE CONTACT: Arcata Fish and Wildlife Office, David Imper (707) 822-

7201; David\_Imper@fws.gov

#### BIOLOGICAL INFORMATION:

Due to the extremely remote location of the Red Mountain Wilderness, access is difficult, and the BLM maintains the most up-to-date information regarding this species and its habitat. CDFG maintains the most up to date information pertaining to the Little Red Mountain site. We have reviewed our files, the California Natural Diversity Data Base (CDFG 2010), and contacted the Arcata Office of BLM as part of updating this candidate form.

### Species Description

This perennial herb forms loose spreading mats 20-50 centimeters (cm) (8-17.5 inches [in]) in diameter. Leaves are clustered on low stems, leaf blades are 4-10 cm (1.7 -4 in) in length, and are oblanceolate, and silvery-silky, especially below. Blooms are ball-shaped, composed of several smaller flowers about 5 -7 millimeters (0.25 -0.37 in) in size and whitish to rose in color.



### Taxonomy

Asa Gray (1870, p. 293) described this taxon from specimens collected in 1869 by Dr. A. Kellogg from the type locality at Red Mountain, Mendocino County, California.

### Habitat/Life History

This serpentine endemic is found in rocky barren, openings in lower montane coniferous forests between 580 and 1,250 meters (1,900 and 4,100 feet) in elevation (Jennings 2003, pp. 1-8).

### Historical and Current Range/Distribution

This species appears to have always been rare, and is currently known to occupy 80 square meters (900 square feet) of habitat at Little Red Mountain, and an estimated 32 hectares (ha) (81 acres [ac]) of habitat scattered over 10.4 square kilometers (4 square miles) at Red Mountain, Mendocino County, California.



Distribution of *Eriogonum kelloggii* in California by county;  
Used with permission of Calflora (2008)

#### Population Estimates/Status

Jennings (2003, p. 8) mapped the majority of *Eriogonum kelloggii* occurring within the Red Mountain Wilderness, and a portion of the species occupying privately held lands at Red Mountain in 2004. Forty one occupied polygons, encompassing approximately 27 ha (67 ac), scattered over about 10.4 square kilometers (4.0 square miles) were mapped on BLM lands. Polygons ranged in size from less than 0.4 ha (1 ac) to nearly 4 ha (10 ac). Another three polygons encompassing an estimated 5 ha (14 ac) were mapped on private lands nearby. Jennings (2003, p. 2) estimated a minimum total population of *Eriogonum kelloggii* observed in his survey effort at 6,500 plants. Based on a more accurate sample count of plants within just one of his polygons and extrapolating to the entire occupied area, Jennings' data suggest the total population could be on the order of 63,000 plants. The above estimates of occupied habitat and population do not include potential habitat located on the steep slope above Cedar Creek and on private lands located away from the access roads. The unsurveyed areas are not expected to contribute more than 10-20 percent to the estimate of total occupied habitat and population.

Staff from the U.S. Fish and Wildlife Service (USFWS) and CDFG relocated what is thought to be the historical site for *Eriogonum kelloggii* on Little Red Mountain in 2003 (Imper 2003). That site is owned by CDFG. A total of 50 plants were observed there. A search of suitable habitat elsewhere on the mountain found no additional plants.

Dr. Michael Baad monitored thirteen 5 square meter (16 square feet) permanent plots at three study sites on Red Mountain annually between 1987 and 1998, and in 2002 (Baad 2002, pp. 2-39). Individual plants were counted, mapped, measured, and classified as to reproductive class.

His research showed considerable annual variation in plant density and reproductive success, but no discernible long-term trends at two of the three study sites (Baad 2002, p. 5). One study site exhibited a decline in plant density by 65 percent over the past 11 years, and a second area exhibited a pronounced reduction in reproductive success since 1998. The latter study area is located adjacent to and within a stand of knobcone pine (*Pinus attenuata*) that burned approximately 40 years ago. The decline in reproductive success may be a result of progressive growth of trees and shrubs leading to canopy closure as part of the recovery from fire (Baad 2002, pp. 5-6).

Most of the historic occurrences mapped by Baad on BLM land in 1986 (Baad 1987, p. 4) were relocated by Jennings (2003, p. 2). However, the low resolution of the 1986 mapping effort and the limited scope of the 2003 mapping effort prevented our making any conclusions regarding population trends.

#### THREATS:

A. The present or threatened destruction, modification, or curtailment of its habitat or range. The entire known distribution of *Eriogonum kelloggii* at Red Mountain continues to be held under unpatented lode and/or placer mining claims, and/or is privately owned by past or current mining interests (BLM 2009). No mining is currently conducted on BLM or private lands, and no validity exams have been conducted on any of the mining claims (see below). One of the claim holders that has a known *E.kelloggii* occurrence recently passed away, and the heir to the estate has indicated, at least for the time being, she has no interest in pursuing mining (Wheeler, pers. comm. 2009). It is not known if a valid mining claim is held covering the Little Red Mountain site, owned by the CDFG (Fabula, pers. comm. 2004).

Under the Northern California Coastal Wild Heritage Wilderness Act of 2006 (H.R. 233 [109<sup>th</sup>]) 6,500 acres on and around Red Mountain was designated wilderness, added to the existing South Fork Eel Wilderness Area. That legislation specifically retained valid land rights, such as mining claims, in existence on the date of enactment. However, the area was withdrawn from all new forms of 1) entry, appropriation, or disposal under the public land laws; 2) location, entry and patent under mining laws, and 3) disposition under all laws pertaining to mineral and geothermal leasing or mining of materials.

For the existing claims, before BLM may approve a mining plan of operations, the BLM minerals staff must conduct a validity examination to determine if the claim is valid (J. Willoughby, BLM, pers. comm. 2007). The validity exam involves a determination of whether a mining operation on the claim was economically viable at the time the claim was filed. Because there are different claimholders on Red Mountain that likely filed claims at different times, separate validity exams would need to be performed, raising the cost of conducting the examination. Due to the high cost of the validity examinations, BLM typically only does them when a plan of operations is filed by a claimholder (Willoughby, pers. comm. 2007). The BLM

has 60 days to determine if sufficient information was provided to conduct a validity examination, and then 2 years to complete the examination. If the validity examination fails, the claim is cancelled. If the claim is determined to be valid, the claimant may file patent to gain ownership to the land, although for short-lived mining operations a patent is often not filed. The BLM does not have the right to deny such a patent. There appears to be some legal uncertainty as to whether a patent within designated wilderness area covers both the land and mineral rights, or just mineral rights. The majority of recently conducted validity examinations in California have failed (Willoughby, pers. comm. 2007).

Any mining operation on Red Mountain would most likely be an open-face bench type that would involve removal and processing of the mineral-bearing ore containing nickel, chromium, and cobalt (U.S. Fish and Wildlife Service [Service] 1984, p. 14). All vegetation and habitat for *Eriogonum kelloggii* could potentially be removed in the affected area. Although the operations plan would require restoration of the affected areas, plant species composition would undoubtedly be altered. There is no evidence in the literature indicating *Eriogonum kelloggii* is able to recolonize disturbed soils.

With regard to the potential for Red Mountain to be mined, a Bureau of Mines Preliminary Feasibility Study conducted at Red Mountain in 1978 concluded those deposits met the minimum tonnage grade test at the time; i.e., 35 million short tons of material containing an average 0.8 percent nickel (Geer, pers. comm. 1995). However, commercial mining at Red Mountain was not considered economically feasible at the time due to the low relatively low grade of the resource (low metal concentrations) and the high cost of mining it (Geer, pers. comm. 1995). The likelihood and extent of future mining will depend on the future economic feasibility and demand for minerals found in the area.

In addition to mining, other factors that could potentially destroy, modify, or curtail its habitat include road construction, widening and maintenance, off-road vehicle (ORV) use, logging and vegetation encroachment. The majority of past soils disturbance at Red Mountain in general has been caused by mining exploration and road construction, both for mining access and fire control (Imper and Wheeler, unpubl. data 2009). The small population of *Eriogonum kelloggii* located at Little Red Mountain is situated along the edges of an old mining access road. That population likely was severely impacted or potentially eliminated by the road construction and fire control efforts during the Red Mountain fire of 2008 (Koller, pers. comm. 2009). The current OHV use at Red Mountain is largely related to illegal marijuana gardens. There is a proposal to enhance recreational use of the Red Mountain Wilderness with construction of a foot and/or horse trail, which would encourage public use and likely discourage marijuana growing and illegal vehicle use (Wheeler, pers. comm. 2009).

Habitat modification as a result of natural vegetation changes in absence of fire may be a primary threat to this species, at least in the long term. Fire has been shown to be an important factor affecting vegetation patterns and maintenance of many open habitats, similar to *Eriogonum kelloggii* habitat, across the Klamath Bioregion, lying immediately north and east of Red Mountain, and the North Coast Bioregion, which includes Red Mountain (Skinner *et al.* 2006, pp. 175-178; Skinner *et al.* 2009, pp. 76-98). Pre-European settlement fire-return intervals for mixed conifer stands, while variable, in some cases ranged as little as 6-8 years (Skinner *et al.*

2009, pp. 83-84). A dramatic decline in fire frequency since then has allowed conifer encroachment or establishment of dense shrub stands in many areas of the region.

Only 2 fires appear to have influenced the Red Mountain area over at least the past 90 years. The Red Mountain Lightning fire of June, 2008, burned approximately 3,000 acres within the Red Mountain Wilderness (BLM 2008). The fire burned some 1,000 acres at the top of Red Mountain, with reportedly 80 percent mortality of brush and 10 percent tree mortality (J. Wheeler, BLM, pers. comm. 2008). The actual burn footprint was highly irregular, and the majority of the burned habitat appeared to have experienced a relatively low intensity ground fire, with little crowning (Imper and Wheeler, unpubl. data 2009). Some 42 percent of the occupied polygons mapped by Jennings (2003, p. 2) occur within the boundary of that fire, but the extent that occupied habitat was directly affected by the fire is unknown. The single population known on Little Red Mountain was located on the exact boundary of the Red Mountain Fire, and may have been severely impacted or eliminated by fire control efforts (Koller, pers. comm. 2009).

Prior to the 2008 fire, the only fire included on the Fire and Resource Map Project's (FRAP) online historical fire database (California Department of Forestry and Fire Protection 2009) for the immediate area of Red Mountain since the 1920's, was the 1952 Lynch Fire. Evidence suggests the Lynch Fire may have stimulated germination and growth of *Pinus attenuata* in some areas affecting the distribution of *Eriogonum kelloggii* on the mountain (Service 2010, p. 16).

Baad (2002, pp. 6-7) recognized the threat from vegetation encroachment to at least 3 rare plants known from Red Mountain, including *Eriogonum kelloggii*, *Sedum eastwoodiae* (Red Mountain stonecrop) and *Arabis macdonaldiana* (McDonald's rockcress). He attributed suppressed reproductive output in *Eriogonum kelloggii* and *Arabis macdonaldiana* at one site to conifer invasion following fire 40 years ago. Clearly, the rate at which habitat becomes unsuitable in absence of fire varies. The manner and degree to which the 2008 Red Mountain Fire affected *Eriogonum kelloggii*, either positively, by setting back natural succession within its habitat, or negatively, by killing the plant, is not known.

B. Overutilization for commercial, recreational, scientific, or educational purposes.

No threats are known at this time.

C. Disease or predation.

No threats are known at this time.

D. The inadequacy of existing regulatory mechanisms.

The State of California listed *Eriogonum kelloggii* as endangered in 1982. The species is included on List 1B (rare and endangered throughout its range) maintained by the California Native Plant Society. As a list 1B species, projects located on private lands and subject to review under the California Environmental Quality Act must disclose potential for impacts on the species. As a State-listed species, *Eriogonum kelloggii* is subject to the provisions of the

California Endangered Species Act (CESA) and California Native Plant Protection Act (NPPA). Where mining is proposed, the plant may also be covered under the Surface Mining and Reclamation Act and California Environmental Quality Act. The degree to which each of these acts, separately or in combination, would protect this species is complex and subject to legal interpretation. In particular, the NPPA contains exceptions to CESA which specifically cover mining assessment work. In general, existing State protections would emphasize mitigation as opposed to avoidance to avoid significant impacts. However, in this situation the species is confined to unique soils within a small geographic area, sits directly on top of the ore-bearing deposits, and is not known to occur on severely disturbed soils. In such a situation, the degree to which mitigation can substitute for avoiding the habitat is highly questionable. *Eriogonum kelloggii* is also listed as sensitive by the BLM, which would provide limited protection for that portion of the distribution located on BLM lands.

E. Other natural or manmade factors affecting its continued existence.

Other natural or manmade threats to *Eriogonum kelloggii* are related to its small distribution and overall population, and the potential impacts of climate change. Small populations are more prone to impacts from random environmental events, and from genetic impoverishment as a result of habitat fragmentation, genetic isolation and declining effective population size (Saunders *et al.* 1991, pp. 18-32; Meffe and Carroll 1997, pp. 269-304).

There is no specific information available, both on the likely affects of climate change specific to the Red Mountain region, and whether the ecological characteristics of occupied, or nearby suitable habitat for *Eriogonum kelloggii* there may buffer the affects of climate change. However, if climate change in this portion of California results in a warming trend, casual observation has suggested a majority of the distribution of *Eriogonum kelloggii* occurs in upland, often exposed, xeric habitats that are expected to offer less refuge under drying or warming conditions.

CONSERVATION MEASURES PLANNED OR IMPLEMENTED:

Designation of 6,173 acres of BLM property at Red Mountain as a wilderness study area (WSA) in 1979, 6,895 acres as an ACEC/Research Natural Area (RNA) in 1984, and the recent designation as wilderness has to some extent focused management concern and direction toward conservation of the unique botanical and soils values, old growth forest, raptor habitat and anadromous fisheries (BLM 1995, pp. 3-6 to 3-9). Annual visits are generally conducted by BLM staff to ensure that no new road construction occurs (Wheeler, pers. comm. 2005). Most, or all, of the occupied or suitable habitat for *Eriogonum kelloggii* in the vicinity of the Red Mountain Wilderness was recommended for acquisition (willing landowners) in the Resource Management Plan (RMP) for the area (BLM 1995, pp. 2-32 to 2-37). The RMP also excludes livestock grazing and off-road vehicle use from the area.

Conservation measures implemented in 2009 for *Eriogonum kelloggii* included only a visual inspection and photo-documentation of a portion of its habitat. Previous conservation measures included initiation of the long term life history and population monitoring in 1987 (Baad 2002,

pp. 2-8); field mapping of occupied habitat on public lands in 2003 (Jennings 2003, pp. 1-8); and general ongoing public outreach activities such as public field trips and academic visitation. BLM staff applied for grant funding to conduct an ecological assessment (see item 4 under “Recommended Conservation measures” below). That effort was unsuccessful, but both Service and BLM staff will continue to seek funding to implement a complete population inventory, and ecological assessment of its habitat.

SUMMARY OF THREATS: (including reasons for addition or removal from candidacy, if appropriate)

Primary threats to this species include destruction of its habitat as a result of surface mining, and modification of its habitat by encroaching vegetation as a result of fire exclusion. We find that *Eriogonum kelloggii* is warranted for listing throughout all its range and, therefore, find that it is unnecessary to analyze whether it is threatened or endangered in a significant portion of its range

For species that are being removed from candidate status:

\_\_\_\_\_ Is the removal based in whole or in part on one or more individual conservation efforts that you determined met the standards in the Policy for Evaluation of Conservation Efforts When Making Listing Decisions (PECE)?

#### RECOMMENDED CONSERVATION MEASURES:

1) Habitat occupied by *Eriogonum kelloggii* should be withdrawn from all minerals entry.

2) Subject to landowner authorization, the extent of *Eriogonum kelloggii* occurrence on adjacent private property should be documented.

3) Collect field data necessary to develop a baseline population estimate for the species throughout its range.

4) Conduct a field investigation to assess the fire history within *Eriogonum kelloggii* habitat and the relative impacts from the 2008 Red Mountain fire, and the degree which shrub and tree encroachment may be impacting the population. If warranted, begin agency coordination and fieldwork in preparation for experimental reintroduction of fire into *Eriogonum kelloggii* habitat.

#### LISTING PRIORITY

THREAT			
Magnitude	Immediacy	Taxonomy	Priority
<b>High</b>	Imminent	Monotypic genus	1
		Species	2
		Subspecies/population	3
	<b>Non-imminent</b>	Monotypic genus	4
		<b>Species</b>	<b>5*</b>

		Subspecies/population	6
Moderate to Low	Imminent	Monotypic genus	7
		Species	8
		Subspecies/population	9
	Non-imminent	Monotypic genus	10
		Species	11
		Subspecies/population	12

Rationale for listing priority number:

*Magnitude:*

Magnitude of threat to *Eriogonum kelloggii* is rated high. The entire population, with the exception of the few plants located at Little Red Mountain, is either privately held or covered under existing mining claims. The *Eriogonum kelloggii* distribution is currently highly fragmented, consisting of 44 relatively small polygons scattered over 10.4 square kilometers (4 square miles). While some colonies or populations may persist if the area is mined, the increased fragmentation and reduction in overall population are potentially significant in affecting population viability. Based on the observed, nearly complete affinity of this species with undisturbed soils, mining undoubtedly will render the affected habitat unsuitable for the species for a significant period.

*Imminence:*

Imminence of threat is rated non-imminent. There is no current mining activity affecting *Eriogonum kelloggii* or its habitat. Any proposed mining would be subject to an application process, during which BLM would treat this species as if it were currently federally listed, and request conferencing (optional) with the USFWS. The mining claim would also have to proceed through the validation process.

Without periodic fire affecting vegetation structure and composition within its habitat, we expect *Eriogonum kelloggii* will ultimately decline over much if not all of its habitat due to encroachment by shrubs and trees. The rate at which surrounding vegetation structure and composition, in absence of fire, will negatively affect *Eriogonum kelloggii* is unknown. Due to the slow growth rates typically exhibited on serpentine-derived soils, the rate at which habitat becomes unfavorable for *Eriogonum kelloggii* will likely be slow at least in portions of its distribution.

Rationale for Change in Listing Priority Number (insert if appropriate) NA

Yes Have you promptly reviewed all of the information received regarding the species for the purpose of determining whether emergency listing is needed?

Is Emergency Listing Warranted?

Emergency listing is not warranted at this time, based on the following: a lack of current mining activity, either on public or privately held lands in the Red Mountain area; and any mining

proposed on BLM lands would be subject to conferencing (optional) with USFWS with regard to *Eriogonum kelloggii* and its habitat.

#### DESCRIPTION OF MONITORING

Both the Red Mountain and Little Red Mountain sites are remote, surrounded by private landowners, and require authorization for access from private parties. BLM and/or USFWS personnel generally visit the Red Mountain site on an annual basis to conduct a general reconnaissance and generally assess the status of the species. The Little Red Mountain site was only recently relocated. Since then, CDFG personnel have visited the site several times, but no formal monitoring of the *Eriogonum kelloggii* at Little Red Mountain is ongoing. The USFWS and BLM maintain routine contact regarding the Red Mountain site. BLM personnel are frequently in contact with the Coombs Tree Farm Company (private owner of all non-public owned *Eriogonum kelloggii* habitat), in conjunction with requesting access through their property to the Red Mountain Wilderness.

The only past monitoring of this species was conducted by Dr. Michael Baad, and by Service and BLM staff in 2009 (limited monitoring). Monitoring focused on the plant life history and site-specific trends in population over time, and included permanent plots located at three study sites within the Red Mountain Wilderness, read annually between 1987 and 1998, in 2002 and 2006. Individual plants were counted, mapped, measured, and classified as to reproductive class (Baad 2002, pp. 2-39). Service and BLM staff completed the monitoring in 2009 (Imper and Wheeler 2009).

The majority of the distribution of *Eriogonum kelloggii* within the Red Mountain Wilderness, and on private lands immediately adjacent to the access road was mapped in 2003, to gather baseline data on the species' distribution and population (Jennings 2003, pp. 1-8). No accurate distribution maps or current population estimates existed prior to this survey. Limited abundance data were collected from two of the mapped polygons. The mapping effort was conducted to provide the basis for a more accurate baseline estimate of the population, to be conducted pending available funds and staffing.

Given the remote nature of *Eriogonum kelloggii* habitat, current low susceptibility to human impacts, and relatively stable nature of the habitat from an ecological standpoint, the current frequency of monitoring is considered adequate to detect any significant threats. Efforts were made by BLM in 2010 to fund an ecological assessment of the fire history within *Eriogonum kelloggii* habitat, the impact of the 2008 Red Mountain fire, and the degree which shrub and tree encroachment may be impacting the population. Those efforts were unsuccessful, but will continue until the assessment is funded.

#### COORDINATION WITH STATES

Input regarding species status and agency coordination was requested from the State of California, Department of Fish and Game on March 23, 2010 (Attn: Scott Koller, Willits Office; Tony Labanca, Eureka Office; Mary Ann Showers, Sacramento Office; and Roxanne Bittman, California Natural Diversity Database, Sacramento).

#### LITERATURE CITED

## A. Literature

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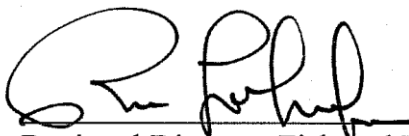
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APPROVAL/CONCURRENCE: Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes, including elevations or removals from candidate status and listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all resubmitted 12-month petition findings, additions or removal of species from candidate status, and listing priority changes.

Approve:

  
Regional Director, Fish and Wildlife Service

Date 6.7.2010

Concur:

  
ACTING  
Director, Fish and Wildlife Service

Date: October 22, 2010

Do not concur:

\_\_\_\_\_  
Director, Fish and Wildlife Service

Date

Director's Remarks:

Date of annual review: April 2010

Conducted by: David Imper

FY 2010, R8 CNOR: Red Mountain buckwheat